

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CLINTON

INDEX NUMBER 2023-00023615

TD BANK USA, N.A.

PLAINTIFF,

FILE NO. F068659

-AGAINST-

AFFIRMATION

SAMANTHA N JENNETTE

DEFENDANT.

AFFIRMATION OF NON-EXPIRATION OF STATUTE OF LIMITATIONS

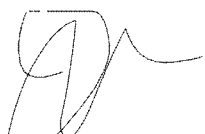
Joseph Ranaldo, Esq., an attorney duly admitted to the practice of law in the State of New York, hereby affirms the following to be true pursuant to CPLR § 2106 and under the penalties of perjury states that:

1. The statute of limitations for the cause of action asserted herein commenced running on or about January 14, 2023. The statute of limitations for the cause of action asserted herein is three years based on the law in New York. The action was filed on or about October 2, 2023. Based on my reasonable inquiry, I believe the applicable statute of limitations for the cause of action asserted herein did not expire prior to the filing of this action.

WHEREFORE, Plaintiff respectfully requests the entry of a default judgment against the Defendant(s).

I certify that, to the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, that the presentation of this judgment and all accompanying papers or the contentions herein are not frivolous as defined in 22 NYCRR § 130-1-1(a).

Dated: December 8, 2023



Joseph Ranaldo, Esq.

